

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicants: Aigner et al.

Application No.: 10/550,446

Filing Date: 10/12/2006

For: FRAMEWORK FOR COMPOSITE
APPLICATIONS

)
) Confirmation No.: 4635

) Group Art Unit: 2191

) Examiner: Chen, Qing

) Docket No.: 2003P00548WOUS
) (S33.033)

) **PTO Customer Number 52025**

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Mail Stop Appeal – Patents (via EFS)
Commissioner for Patents
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Sir:

Applicants submit the following **Reasons** in support of the Pre-Appeal Brief
Request For Review filed herewith:

The **Reasons** begin on page 1 below.

REASONS

The following is evidence of clear error in the rejection of claim 1.

The rejection of claim 1 states that Burke et al. disclose **the at least one generic collaboration service linked with the business object by the business object modeling layer** (see Final Office Action, page 5, lines 5-8, stating that Burke et al. disclose: "- wherein the object modeling layer that comprises the business object modeler to provide the user interface (UI) for constructing the business object comprises a module to derive at least one object specific service from **the at least one generic collaboration service linked with the business object by the business object modeling layer . . .**") (emphasis adjusted).

The rejection of claim 1 subsequently states that Burke et al. do not disclose a **business object modeling layer linking at least one of the collaboration services to the business object** (see Final Office Action, page 6, lines 5-6, stating that Burke et al. does not disclose: "- a **business object modeling layer linking at least one of the collaboration services . . . to the business object . . .**").

Consequently, after stating that Burke et al. disclose **the at least one generic collaboration service linked with the business object by the business object modeling layer** (Final Office Action, page 5, lines 5-8), the rejection of claim 1 states that Burke et al. do not disclose a **business object modeling layer linking at least one of the collaboration services to the business object** (Final Office Action, page 6, lines 5-6).

These two statements in the Final Office Action are inconsistent with one another.

The rejection of claim 1 is unclear and clearly in error for at least this reason.

In addition, Applicants respectfully point out that the first statement cited from the rejection, which asserts that Burke et al. disclose **the at least one generic collaboration service linked with the business object by the business object modeling layer** (Final Office Action, page 5, lines 5-8), is not accompanied by an

explanation as to how Burke et al. could possibly teach that the at least one generic collaboration service (which page 5, lines 3-4 of the Final Office Action asserts is taught by design and specification of a business object) is linked with the business object by the business object modeling layer (which page 4, lines 3-5 of the Final Office Action asserts is taught by the Enterprise Explorer software component).

The rejection of claim 1 is also unclear and clearly in error for this reason.

The following is being pointed out but is not being relied upon in these Reasons.

In the event that the Examiner decides to take the position that it would have been obvious to modify Burke et al. to provide **the at least one generic collaboration service** (which page 5, lines 3-4 of the Final Office Action asserts is taught by the design and specification of a business object) **linked with the business object by the business object modeling layer** (which page 4, lines 3-5 of the Final Office Action asserts is taught by the Enterprise Explorer in Burke et al.), Applicants respectfully point out that it is not at all clear that it would have been obvious to modify Burke et al. to provide **the at least one generic collaboration service** (which page 5, lines 3-4 of the Final Office Action asserts is taught by the design and specification of a business object) **linked with the business object by the business object modeling layer** (which page 4, lines 3-5 of the Final Office Action asserts is taught by the Enterprise Explorer in Burke et al.)

Wouldn't a business object in Burke et al. be linked to the design and specification of the business object without the need to be linked to the design and specification of the business object by the Enterprise Explorer in Burke et al.?

Applicants have noted col. 6, lines 48-51 of Goodwin et al., which is cited in the portion of the rejection that states that Burke et al. do not disclose **a business object modeling layer linking at least one of the collaboration services to the business object** (Final Office Action, page 6, lines 5-13).

However, col. 6, lines 48-51 of Goodwin et al. state that "unified models 206 together comprise a repository that manages object schema (i.e., the unified models

206) and their links to enterprises resources, such as databases and world wide web sites". (emphasis added).

Thus, the links disclosed at col. 6, lines 48-51 of Goodwin et al. would appear to be between object schema and external resources, not between the design and specification of an object and the object itself.

In addition, Applicants have also noted the motivation set forth in the portion of the rejection that states that Burke et al. do not disclose **a business object modeling layer linking at least one of the collaboration services to the business object** (Final Office Action, page 6, lines 5-13). Such portion of the rejection states that one would be motivated to associate a collaborative service with a business object so that the business object can reference the collaboration service directly.

Applicants respectfully point out that claim 1 does not merely recite a collaborative service associated with a business object. Rather, claim 1 recites **a business object modeling layer** (which page 4, lines 3-5 of the Final Office Action asserts is taught by the Enterprise Explorer in Burke et al.) **linking at least one of the collaboration services** (which page 5, lines 3-4 of the Final Office Action asserts is taught by the design and specification of a business object) **to the business object**.

In view thereof, the motivation set forth in the rejection is, in effect, asserting that one would be motivated to use the Enterprise Explorer in Burke et al. to link the design and specification of a business object with a business object so that the business object can reference the design and specification of the business object directly.

Applicants respectfully submit that a business object in Burke et al. is able to reference the design and specification of the business object without the need to use the Enterprise Explorer of Burke et al. to link the business object to the design and specification of the business object?

Thus, it is not at all clear that one of ordinary skill would have been motivated to use the Enterprise Explorer in Burke et al. to link a business object with the design and specification of a business object as appears to be proposed in the portion of the rejection that states that Burke et al. do not disclose **a business object modeling**

layer linking at least one of the collaboration services to the business object
(Final Office Action, page 6, lines 5-13).

In the event that prosecution is re-opened, Applicants respectfully request that a clear explanation addressing the above points be included in the next Office Action.

In the event that the Panel decides not to re-open prosecution, Applicants respectfully request that a clear explanation addressing the above points be included in the Notice of Panel Decision.

Other evidence

Applicants respectfully reserve the right to present other evidence as to clear error in the rejection of claim 1 in any future paper and/or proceeding.

Other claims

Applicant respectfully reserves the right to address the rejections of the other claims in any future paper and/or proceeding.

Respectfully submitted,

May 17, 2011
Date

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